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Via ECFS Filing Only

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
445-12th Street, S.W.
Room TW-A325
Washington, D.C. 20554

Re: Report of Oral Ex Parte Presentation of Robert Bosch, LLC;

ET Docket No. 15-26, Amendments of Parts 1, 2, 15, 90, and 95 of the Commission's Rules to Permit Radar Services in the 76-81 GHz Band;

ET Docket No. 11-90, Amendment of Sections 15.35 and 15.253 of the Commission's Rules Regarding Operation of Radar Systems in the 76-77 GHz Band;

ET Docket No. 10-28, Amendment of Section 15.253 of the Commission's Rules to Permit Fixed Use of Radar in the 76-77 GHz Band;

WT Docket No. 11-202, Amendment of the Commission's Rules to Permit Radiolocation Operations in the 78-81 GHz Band.

Greetings:

Today, Mr. Bill Broderick of Robert Bosch, LLC (Bosch), and the undersigned, communications counsel for Bosch in the above-captioned proceedings, met with the following staff of the Office of Science and Technology at the Commission offices in Washington, D.C.:

Julius Knapp
Karen Rackley
Matthew Hussey
Jamison Prime
Ira Keltz
Geraldine Matise
Patrick Forster
Howard Griboff

The discussion about the captioned docket proceedings made on behalf of Bosch is summarized as follows:

ET Docket 15-26 (Allocation of the 76-81 GHz Band for Automotive Radars and a Sunset Provision for the 24 GHz Automotive Radar Band). Robert Bosch, LLC, the petitioner in this proceeding, requests a timely resolution of the proposed allocation of the band 77-81 GHz for short-range automotive radars pursuant to the Notice of Proposed Rule Making. As well, we ask for clarity relative to the Commission's proposed sunset of both equipment authorization and installation in new motor vehicles of 22-29 GHz ("24 GHz") automotive radars in the United States. The 24 GHz issue, though ancillary to the main purpose of the Docket 15-26 proceeding, is urgent for automotive equipment manufacturers relative to near-term planning. Further delay in the resolution of this docket proceeding, including the 24 GHz sunset issue, would be detrimental to the worldwide harmonization effort for automotive radars, and to the improved safety of persons and property that 77-81 GHz short-range radar technology ensures.

The point of Docket 15-26 is to further the worldwide plan to consolidate automotive radars in the 76-81 GHz band, in lieu of 24 GHz.

The Notice proposes to grandfather, for the life of the equipment, vehicular radars that are already installed or in use in the 22-29 GHz band range, so as to avoid the need to replace or discontinue the use of those radar systems. The Commission also proposes to prohibit the certification of new vehicular radars that do not operate in the 76-81 GHz range, effective 30 days from the date of publication of final rules regarding the 76-81 GHz band in the Federal Register. It also asked for comment as to how 22-29 GHz radars should be addressed relative to the transition to the 77-81 GHz band.

It is reasonable to: (1) cease new equipment authorization grants as of the effective date of a Report and Order in this proceeding; (2) grandfather equipment authorizations for 22-29 GHz vehicular radars granted prior to the effective date of the Report and Order; (3) continue to permit the maintenance and repair of those radars that are already installed and in use for the life of a motor vehicle without a time limitation; and (4) continue to permit new installations of those 24 GHz radars which have grandfathered equipment authorizations until a fixed sunset date. There is an anticipated sunset date of 2022 for 24 GHz radars in Europe, which is sufficiently far in the future that to adopt the same timetable in the United States is not burdensome.

The above summary of this oral *ex parte* presentation is submitted pursuant to Section 1.1206(b)(2) of the Commission's Rules.

Respectfully submitted,



Christopher D. Imlay
Counsel for Robert Bosch, LLC